

1  
2  
3  
4  
5  
6                   UNITED STATES DISTRICT COURT FOR THE  
7                   WESTERN DISTRICT OF WASHINGTON  
8                   AT SEATTLE

9  
10 PHUONG HUYNH,

11                   Plaintiff,

12                   v.

13                   UNITED STATES POSTAL SERVICE,

14                   Defendant.

15                   CASE NO. 2:19-cv-01291-RSM

16                   STIPULATED MOTION TO  
17                   EXTEND INITIAL SCHEDULING  
18                   DATES AND ORDER

19                   COMES NOW Plaintiff, Phuong Huynh, by and through his attorney, Ronald  
20 Unger, and Defendant, United States Postal Service, through its counsel, Tricia Boerger,  
21 Assistant United States Attorney, in this stipulated motion to extend the initial scheduling  
22 dates in this matter as follows:

23                   Deadline for FRCP 26(f) Conference:                   11/06/2019

24                   Initial Disclosures Pursuant to FRCP 26(a)(1):           11/13/2019

25                   Combined Joint Status Report and Discovery  
26                   Plan as Required by FRCP 26(f) and Local  
27                   Civil Rule 26(f):   11/20/2019

28                   This extension is necessary because none of the Defendant has not yet filed an  
answer. Defendant is still working with the named federal agency to review the facts and  
claims in this matter. As such, Defendant is not in a position to meaningfully participate  
in a discovery conference, submit initial disclosures or prepare a discovery plan.

STIPULATED MOTION TO EXTEND  
INITIAL SCHEDULING DATES  
AND ORDER - 1  
2:19-cv-01291-RSM

United States Attorney's Office  
700 Stewart Street, Suite 5200  
Seattle, Washington 98101  
(206) 553-7970

1 Defendant's responsive pleading is due on October 28, 2019. As such, the parties are  
2 requesting an extension of time for the initial scheduling dates to allow them adequate  
3 time to review the initial pleadings and participate meaningfully in the FRCP 26 process.

4 DATED this 1st day of October, 2019.

5 **SO STIPULATED**

6 Respectfully submitted,

7  
8 BRIAN T. MORAN  
9 United States Attorney

10 s/ Ronald Lewis Unger  
11 Ronald Lewis Unger, WSBA #16815  
Buckley & Associates  
12 675 South Lane Street, Suite #300  
Seattle, WA 98104  
13 Telephone: (206) 622-1100  
Fax: (206) 622-0688  
Email: runger@buckleylaw.net  
15 Attorney for Plaintiff Phuong Huynh

16 s/ Tricia Boerger  
17 TRICIA BOERGER, WSBA #38581  
18 Assistant United States Attorney  
19 Western District of Washington  
United States Attorney's Office  
20 700 Stewart Street, Suite 5220  
Seattle, Washington 98101  
Phone: (206) 553-7970  
Email: tricia.boerger@usdoj.gov  
22 Attorney for the Defendant

## ORDER

Pursuant to the parties' motion, and the parties having stipulated and agreed, and the Court finding good cause, it is hereby **ORDERED** that the initial scheduling dates in this matter shall be revised as follows:

Deadline for FRCP 26(f) Conference:	11/06/2019
Initial Disclosures Pursuant to FRCP 26(a)(1):	11/13/2019
Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f):	11/20/2019

DATED this 3<sup>rd</sup> day of October 2019.

Ricardo S. Martinez  
RICARDO S. MARTINEZ  
CHIEF UNITED STATES DISTRICT JUDGE